

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: November 23, 2004 / 11:00 am

Site Contact(s): Carolyn Hicks

Phone: 303-994-9555

Regulatory Contact: Harlen Ainscough

Phone: 303-692-3337

Agency: CDPHE

Purpose of Contact: Approval of RCRA closure for B776 Room 134 west

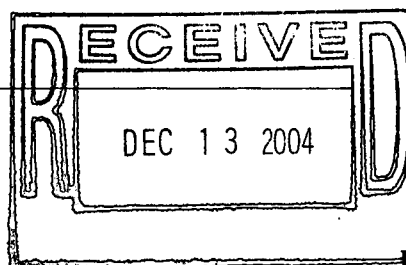
Discussion:

RCRA closure activities have been completed in the north portion of Room 134 west by the Size Reduction Vault. (The south portion of this room by the ASRF was previously closed in a contact record dated 7/28/04.) Room 134 west was a permitted RCRA container storage area in Unit 776.1 and also provided secondary containment for RCRA tanks and piping associated with Units 776.2, 44.01 and 44.02. This unit is being closed under the Building 776/777 DOP.

Most of the room (approximately 2900 sq. ft.) was washed, rinsed and sampled for RCRA closure prior to shaving the paint. However, a portion of the room measuring approximately 20 ft by 40 ft (800 sq. ft.) was inadvertently not washed prior to floor shaving activities. The floor shaving waste was sampled separately to assist with waste characterization. The unwashed portion only provided secondary containment for container storage, not for the tanks or piping in this room. The rinsate data and floor shaving data was provided to Mr. Ainscough on November 16, 2004.

The rinsate had two metals above the RFCA Tier II but these were well below RCRA UTS levels. All organics in the rinsate were below Tier II. The floor shaving debris (paint and concrete) was below RCRA non-wastewater UTS for all characteristic metals. (RFCA Tier II is not applicable, since this is a solid.) Two organic compounds (ethylbenzene and xylene) had levels above the UTS. However, these compounds were not constituents in the hazardous waste stored in RCRA unit 776.1, and are likely from the paint itself. These two compounds above the UTS do not make the shaving debris mixed waste because since the waste is not characteristically hazardous, we do not trigger underlying hazardous constituents.

Mr. Ainscough has concurred that the available results, both rinsate and floor shaving, support disposal as non-mixed waste, and that this area has been closed contingent on final disposition of the building by removal, as is required in the approved Demolition Plan for the facility. The waste will be managed as non-hazardous low-level debris for disposal.



Contact Record Prepared by: Carolyn Hicks

Required Distribution:

M. Aguilar, USEPA
S. Bell, DOE-RFPO
B. Birk, DOE-RFPO
C. Deck, K-H Legal
D. Foss, K-H 707/776/777
S. Garcia, USEPA
C. Gilbreath, K-H 771/774
S. Gunderson, CDPHE
J. Legare, DOE-RFPO

R. Leitner, K-H 371/374
J. Mead, K-H ESS
G. Morgan, DOE-RFPO
S. Nesta, K-H RISS
K. North, K-H ESS/MS
R. Schassburger, DOE-RFPO
D. Shelton, K-H ESS
C. Zahm, K-H Legal

Additional Distribution:

H. Ainscough, CDPHE
E. Kray, CDPHE
G. Schuetz, DOE
D. DelVecchio, K-H 707/776/777
T. Vaughn, K-H 707/776/777